

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CLINT ROBERT SCHRAM,
[DOB: 06/14/1968],

Defendant.

UNDER SEAL

Case No. _____

COUNT ONE:

Engaging in a Child Exploitation Enterprise

18 U.S.C. § 2252A(g)

NLT: 20 Years Imprisonment

NMT: Life Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class A Felony

COUNTS TWO, FOUR, SIX, AND EIGHT:

Conspiracy to Advertise Child Pornography

18 U.S.C. §§ 2251(d) and (e)

NLT: 15 Years Imprisonment

NMT: 30 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class B Felony

COUNTS THREE, FIVE, SEVEN, AND NINE:

Advertisement of Child Pornography

18 U.S.C. §§ 2 and 2251(d) and (e)

NLT: 15 Years Imprisonment

NMT: 30 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class B Felony

Forfeiture Allegation

\$100 Mandatory Special Assessment

Each Count

I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between a date unknown to the Grand Jury, but which is not later than on or about February 21, 2019, and July 21, 2020, the dates being approximate, in the Western District of Missouri and elsewhere, CLINT ROBERT SCHRAM, defendant herein, did engage in a child exploitation enterprise, that is, SCHRAM violated Chapter 110 of Title 18 of the United States Code as part of a series of felony violations constituting three or more separate incidents and involving more than one minor victim—to wit, the offenses described in Counts Two through Nine of this Indictment, incorporated herein—and he committed those offenses in concert with three or more persons, in violation of Title 18, United States Code, Section 2252A(g).

COUNT TWO

Between a date unknown to the Grand Jury, but which is not later than on or about February 21, 2019, and July 21, 2020, the dates being approximate, in the Western District of Missouri and elsewhere, CLINT ROBERT SCHRAM, defendant herein, did knowingly conspire with others unknown to the Grand Jury to make, print, and publish, and to cause to be made, printed, and published, by means of an internet website whose common name is known to the Grand Jury and is referred to herein as “Website A,” any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce any visual depiction, the production of which visual depiction involved the use of a minor engaged in sexually explicit conduct and such visual depiction was of such conduct, knowing and having reason to know that such notice and advertisement would be transported and transmitted using any means

and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, and which notice and advertisement was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, in violation of Title 18, United States Code, Sections 2251(d) and (e).

COUNT THREE

Between a date unknown to the Grand Jury, but which is not later than on or about February 21, 2019, and July 21, 2020, the dates being approximate, in the Western District of Missouri and elsewhere, CLINT ROBERT SCHRAM, defendant herein, did and aided and abetted others who did knowingly make, print, and publish, and cause to be made, printed, and published, by means of an internet website whose common name is known to the Grand Jury and is referred to herein as “Website A,” any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce any visual depiction, the production of which visual depiction involved the use of a minor engaged in sexually explicit conduct and such visual depiction was of such conduct, knowing and having reason to know that such notice and advertisement would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, and which notice and advertisement was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, in violation of Title 18, United States Code, Sections 2 and 2251(d) and (e).

COUNT FOUR

Between a date unknown to the Grand Jury, but which is not later than on or about July 16, 2019, and July 21, 2020, the dates being approximate, in the Western District of Missouri and elsewhere, CLINT ROBERT SCHRAM, defendant herein, did knowingly conspire with others unknown to the Grand Jury to make, print, and publish, and to cause to be made, printed, and published, by means of an internet website whose common name is known to the Grand Jury and is referred to herein as “Website B,” any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce any visual depiction, the production of which visual depiction involved the use of a minor engaged in sexually explicit conduct and such visual depiction was of such conduct, knowing and having reason to know that such notice and advertisement would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, and which notice and advertisement was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, in violation of Title 18, United States Code, Sections 2251(d) and (e).

COUNT FIVE

Between a date unknown to the Grand Jury, but which is not later than on or about July 16, 2019, and July 21, 2020, the dates being approximate, in the Western District of Missouri and elsewhere, CLINT ROBERT SCHRAM, defendant herein, did and aided and abetted others who did knowingly make, print, and publish, and cause to be made, printed, and published, by means of an internet website whose common name is known to the Grand Jury and is referred to herein

as “Website B,” any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce any visual depiction, the production of which visual depiction involved the use of a minor engaged in sexually explicit conduct and such visual depiction was of such conduct, knowing and having reason to know that such notice and advertisement would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, and which notice and advertisement was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, in violation of Title 18, United States Code, Sections 2 and 2251(d) and (e).

COUNT SIX

Between a date unknown to the Grand Jury, but which is not later than on or about March 11, 2019, and July 21, 2020, the dates being approximate, in the Western District of Missouri and elsewhere, CLINT ROBERT SCHRAM, defendant herein, did knowingly conspire with others unknown to the Grand Jury to make, print, and publish, and to cause to be made, printed, and published, by means of an internet website whose common name is known to the Grand Jury and is referred to herein as “Website C,” any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce any visual depiction, the production of which visual depiction involved the use of a minor engaged in sexually explicit conduct and such visual depiction was of such conduct, knowing and having reason to know that such notice and advertisement would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign

commerce by any means including by computer, and which notice and advertisement was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, in violation of Title 18, United States Code, Sections 2251(d) and (e).

COUNT SEVEN

Between a date unknown to the Grand Jury, but which is not later than on or about March 11, 2019, and July 21, 2020, the dates being approximate, in the Western District of Missouri and elsewhere, CLINT ROBERT SCHRAM, defendant herein, did and aided and abetted others who did knowingly make, print, and publish, and cause to be made, printed, and published, by means of an internet website whose common name is known to the Grand Jury and is referred to herein as “Website C,” any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce any visual depiction, the production of which visual depiction involved the use of a minor engaged in sexually explicit conduct and such visual depiction was of such conduct, knowing and having reason to know that such notice and advertisement would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, and which notice and advertisement was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, in violation of Title 18, United States Code, Sections 2 and 2251(d) and (e).

COUNT EIGHT

Between a date unknown to the Grand Jury, but which is not later than on or about April 29, 2020, and July 21, 2020, the dates being approximate, in the Western District of Missouri and elsewhere, CLINT ROBERT SCHRAM, defendant herein, did knowingly conspire with others unknown to the Grand Jury to make, print, and publish, and to cause to be made, printed, and published, by means of an internet website whose common name is known to the Grand Jury and is referred to herein as “Website D,” any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce any visual depiction, the production of which visual depiction involved the use of a minor engaged in sexually explicit conduct and such visual depiction was of such conduct, knowing and having reason to know that such notice and advertisement would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, and which notice and advertisement was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, in violation of Title 18, United States Code, Sections 2251(d) and (e).

COUNT NINE

Between a date unknown to the Grand Jury, but which is not later than on or about April 29, 2020, and July 21, 2020, the dates being approximate, in the Western District of Missouri and elsewhere, CLINT ROBERT SCHRAM, defendant herein, did and aided and abetted others who did knowingly make, print, and publish, and cause to be made, printed, and published, by means of an internet website whose common name is known to the Grand Jury and is referred to herein

as “Website D,” any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce any visual depiction, the production of which visual depiction involved the use of a minor engaged in sexually explicit conduct and such visual depiction was of such conduct, knowing and having reason to know that such notice and advertisement would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, and which notice and advertisement was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, in violation of Title 18, United States Code, Sections 2 and 2251(d) and (e).

FORFEITURE ALLEGATION

The allegations contained in Counts One through Nine are realleged and are incorporated by reference herein for the purpose of alleging forfeiture of: any visual depiction described in Title 18, United States Code, Sections 2251 or 2252A, or any film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of these sections; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and any property, real or personal, used or

intended to be used to commit or to promote the commission of such offenses; including, but not limited to the following facilitating property:

The defendant's residence, Lot 9, Block 5, Line Creek Meadows – Third Plat, A Subdivision in Kansas City, Platte County, Missouri, commonly known as 8524 N. Ava Avenue, Kansas City, Missouri 64154;

All in violation of Title 18, United States Code, Section 2253.

A TRUE BILL.

/s/ Pamela Carter-Smith

FOREPERSON OF THE GRAND JURY

/s/ Alison D. Dunning

Alison D. Dunning

David Luna

Assistant United States Attorneys

Keith A. Becker

Deputy Chief

Kyle P. Reynolds

Trial Attorney

U.S. Department of Justice, Criminal Division

Child Exploitation and Obscenity Section

Date: 7/21/2020
Kansas City, Missouri